

ANNEX C

AGRICULTURE AND FOOD CONTROL MEASURES

PRIMARY AGENCY: Washington State Department of Agriculture

SUPPORT AGENCIES: Washington State Department of Fish and Wildlife
Washington State Department of Health
Washington State Military Department
Washington State Patrol
Washington State Department of Transportation
Adams County
Benton County
Franklin County
Grant County
Walla Walla County
Yakima County
Adjacent States/Provinces

I. INTRODUCTION

A. Purpose

This Annex provides for the coordinated application of food control measures and other agricultural protective actions during the response to facility incidents or emergencies at Columbia Generating Station (CGS), United States Department of Energy Hanford Site and United States Army's Umatilla Chemical Depot (UMCD) with the potential to threaten the public health and safety of people in Washington State.

B. Scope

This Annex describes the general process involved in determining the extent and length of time needed for food control measures.

II. POLICIES

- A.** Food control measures may have to be set up to protect the public from consuming adulterated food and water in the event of an incident or emergency at a facility. Washington State, with the support of affected counties, will carry out the protective actions concerning food supplies, including livestock and the production of milk products. The counties are responsible for assessing the impacts of local area Protective Action

Decisions (PADs) with the assistance of the local United States Department of Agriculture (USDA) agent.

- B.** Specific authorities and procedures for direct intervention in the production, marketing, or consumption of contaminated food products are addressed in Washington State Department of Health (Health) and Washington State Department of Agriculture (WSDA) statutes and procedures.

III. SITUATION

A. Emergency/Disaster Conditions and Hazards

Conditions at a facility may deteriorate, calling for the application of food control measures within a designated area. Details of the methods of determining the affected area(s) are presented in agency operating procedures.

B. Planning Assumptions

1. Facility incidents or emergencies requiring the application of food control measures will occur.
2. Personnel at the facilities and within the offsite emergency response organizations are familiar with food control measures.

IV. CONCEPT OF OPERATIONS

A. General

1. The concern for food control and the deposition exposure pathway begins in the early phase of an incident. Meteorological data, facility data, and measurements taken by appropriately equipped radiation field teams during and immediately after the release will help define the initial actions required when the release is terminated.
2. In the first hours after the radiation release is terminated, radiation field teams will be directed to continue to measure and sample material deposited on the ground to identify areas where ingestion and control of food are of concern.

3. This initial area(s) is plotted on a map at the Emergency Operation Facility (EOF) and sent to decision-makers from the affected county (ies) and state(s). Geopolitical boundaries describing the area(s) in easily recognizable features such as roads and rivers are proposed by the affected county (ies). This proposed boundary is forwarded to the state EOC for coordination. The Decision Makers of the state EOC will evaluate the proposed boundary and then forwards the coordinated boundaries to the Governor's Office in the form of a draft Governor's Order to establish a Food Control Area (FCA) (Annex C, Appendix 1).
4. Health Office of Radiation Protection, Ecology, and WSDA will measure, sample, and analyze food for deposition. As this occurs, the boundary of the FCAs will be adjusted. It is anticipated that the area(s) will be reduced through this process.
5. Watersheds, community water systems, sources of licensed milk production, and food production and processing facilities within the ingestion exposure pathway are listed in the WSDA procedures. Methods and procedures for carrying out protective actions are also described in the same document.
6. The sampling of crops, dairy products, and open water resources is conducted concurrently with the field measurements through field team consisting of WSDA, Ecology, and Health Office of radiation Protection personnel. WSDA personnel only do dairy sampling and will not be present on every field team. Sample collection assistance is requested as needed from the local agricultural community, other states, the Hanford Site, other federal agencies, the nuclear facilities, or commercial firms under contract to conduct this function. The results of laboratory analysis of the samples are factored into the decisions regarding the protective measures to be taken.

B. Notification

The public is notified of food control measures through public information announcements.

1. WSDA will make available an agricultural protective action leaflet at Food Control Points.
2. WSDA or the local office of the Washington State University Cooperative Extension will provide information directly to food producers.

3. The Joint Information Center (JIC) for the incident or emergency will be the primary point for release of general public information.
4. County emergency managers should be prepared to release information identifying the affected areas and provide:
 - a. Agricultural protective action information at EWACs and other locations for residents residing in the Plume and Ingestion Pathway.
 - b. Specific information to home gardeners at EWACs and other locations for those residing in the Plume and Ingestion Pathway.

V. RESPONSE ACTIONS

A. Initial Actions

1. The affected counties issue agricultural advisories when a release is imminent or has begun. The advisories are initially based on projections describing the probable deposition path of the release. This is the first official indication more stringent food control measures may need to be carried out.
2. Health Office of radiation Protection coordinates and directs radiation monitoring resources to determine relocation and food control isopleths.
3. State and county planners develop recommended initial food control boundaries based upon the calculated dose line provided by the Dose Assessment Center (DAC).
4. Based upon the counties' recommended geopolitical boundaries for FCAs, the state EOC will draft a Governor's Order to formally establish the FCAs. The formal Governor's Order will also stop food from being transported out of the FCA. This Order is designed to protect the public from consuming adulterated food.
5. Traffic Control Points (TCPs) will be needed on primary and secondary roads crossing the food control boundary. Food Control Points (FCPs) will be established where major commercial food transportation routes cross the food control boundary. These points serve to restrict transport of food from the FCA until food can be verified to be within accepted health standards by laboratory analysis. Law enforcement and representatives from WSDA, or

other designated agencies will staff the FCPs. Vehicles will need to be stopped to advise the vehicle operators of the Governor's Order.

- a. Commercial food transporters will be directed to return their cargo to its point of origin within the FCA.
 - b. People operating non-commercial vehicles transporting food from the FCA will be asked to return the food to the point of origin or sign a statement voluntarily surrendering their food at the FCP. (See a sample statement at Annex C, Appendix 2). Challengers to this direction should be referred to a FCP where the WSDA representative will explain the conditions in effect.
 - c. In those cases where the FCA is crossed by an interstate highway, or other limited access highways, TCPs should be established at each highway on-ramp within the FCA.
6. Upon determination of the FCA, Health Office of Radiation Protection in coordination with WSDA will establish a sampling plan to sample and monitor milk, pasture, and other agricultural crops to protect the health and safety of the population. Priorities of sampling are based on the risk to the most sensitive population (children) and crop harvest seasons. Laboratory analysis levels at which milk, water, and other food crops are embargoed are found in Appendix A, *Washington State Department of Health, Radiological Emergency Response Plan and Procedures*.
 7. Appropriate responses will consist of the identification and application of measures to protect various elements of the food chain from becoming adulterated. They must also address the proper disposal or diversion of food for which the contamination cannot be prevented or removed.

B. Continuing Actions

1. Support will be needed for ACP and TCP personnel.
2. The protective measures are modified and become increasingly more precise and location-specific as additional data is generated. Ingestion pathway protective measures are based on field data and lab analysis. Health certifies the food per laboratory analysis of samples. WSDA releases or embargoes the food, as appropriate.

3. Once all effects have been analyzed, final protective measures can be designated and implemented until full recovery and restoration activities are complete.

VI. RESPONSIBILITIES

A. Primary Agency: Washington State Department of Agriculture

WSDA is responsible for preventing adulterated food from coming into the food chain through oversight of commercial sales and movement of agricultural commodities. WSDA and Health Office of Radiation work in tandem to provide a comprehensive approach to the radiation ingestion exposure pathway response. WSDA procedures detail how their responsibilities will be accomplished.

1. Provide representatives to operate the FCPs at key transport intersections on the food control boundary with appropriate law enforcement.
2. Target the specific crops and food products proven to be unacceptable for consumption, as the contamination profile is further defined through field samples and laboratory analysis.
3. Identify and monitor the activities of licensed commercial dairies, farms, processing plants, and wholesale distributors, within the ingestion pathway EPZ.
4. Notify the agricultural community of the state's PADs.
5. Assist Health Office of Radiation Protection with obtaining samples for laboratory analysis, at licensed dairies, as requested.
6. Coordinate with county agricultural agents who are charged with identifying family and hobby farms in the ingestion pathway to ensure appropriate protective actions are carried out.
7. With Health, develop a prioritized sampling plan of the projected area(s) affected by a radiological release from a facility.
8. Contribute to the identification of the geopolitical boundaries of the relocation area(s) and food control area(s), and the locations for the FCPs.
9. Issue embargo orders as required, oversee testing of embargoed food, and monitor the proper disposition of adulterated food.

B. Support Agencies

1. Washington State Department of Fish and Wildlife

When Fish and Wildlife land holdings or facilities fall within the FCAs, Fish and Wildlife personnel will be assigned to work cooperatively with other state agencies to conduct sampling in these places, as well as control access into and out of these areas. Fish and Wildlife will work cooperatively with the state EOC Decision Makers to ensure protective actions to control the harvest of fish and game in FCAs are carried out.

2. Washington State Department of Health

Health will coordinate and direct all offsite radiation monitoring to identify affected areas and verify nonaffected areas; monitor and sample, and analyze air, milk, pasture, water, soil, and agricultural products. When the Federal Radiological Monitoring and Assessment Center (FRMAC) is activated at the state's request, Health will continue to coordinate and direct all offsite monitoring operations in collaboration with the FRMAC staff.

- a. Analyze field data, perform dose assessment, and develop Protective Action Recommendations (PARs) that will effectively protect the health and safety of residents and the food supply.
- b. Provide health physics support and contamination control for WSDA Sanitarians when they collect milk samples from a radiologically affected area.
- c. If state and local capacity to deploy the required number of field teams is overwhelmed, prepare a request for federal assistance from the FRMAC.
- d. With WSDA, develop a prioritized sampling plan of the projected area(s) affected by a release from a facility.
- e. Provide technical assessment and analysis of field data to provide basis for county geopolitical boundary proposals for FCAs.
- f. Assign personnel to work cooperatively with WSDA personnel monitoring food at facilities within or near the FCAs, as appropriate.

- g. Consult with the facility and federal support teams, to identify additional laboratory resources qualified to conduct the required analysis of samples, if necessary. Identify needs for additional transportation capabilities to move samples to these laboratories, as required.
- h. Oversee the analysis of samples at all laboratories involved with the response.
- i. Provide continuing regular updates of dose assessment, analysis of field data, and new or refined Protective Action Recommendations (PARs) to the Decision Makers of the state EOC.

3. Washington State Military Department

- a. Emergency Management Division
 - (1) Facilitate the development of the state's PADs and coordinate the carrying out of those decisions during the intermediate and late phases of the response.
 - (2) Facilitate the Governor's adoption of the geopolitical boundaries defining the FCAs. These boundaries are recommended by the affected counties and coordinated with the state EOC. FACPs and TCPs are established by law enforcement agencies. This decision-making process will include consultation with the state of Oregon, if necessary.
 - (3) In coordination with Health, WSDA, ECO, WSP, the affected county(ies), and the state of Oregon, if required, facilitate the staffing and equipment requirements for carrying out traffic control measures, security measures, and food control measures.
 - (4) At regular intervals throughout the event, arrange for a full briefing of the state EOC Decision Makers on the latest sampling and monitoring data, recommendations from the DAC, and other pertinent data. Based on these briefings, validate the boundaries of the FCAs or recommend refinements to these boundaries. Before altering the boundaries, solicit recommendations from the affected county(ies) and consult with the state of Oregon.

- (5) Develop estimates of the probable duration and scope of the intermediate phase response, based on consultation with the facility and the Federal Emergency Management Agency (FEMA). Share these estimates with the affected jurisdictions so all state and local jurisdictions can identify the staffing patterns necessary to accomplish shift changes, and resource requests requiring action by the state or federal governments.
- (6) Coordinate the dissemination of public information with the ingestion pathway county(ies) at regular intervals throughout the intermediate phase.
- (7) Provide operational information to the counties.

b. National Guard

Support the Washington State Patrol (WSP) in traffic control, evacuation, mobile communications, and other areas. Assist local governments as necessary. Specific tasks in support of Health and WSDA operations in the Food Control Areas (FCAs) may also be assigned.

4. **Washington State Patrol**

- a. Conduct traffic control.
- b. Assist local law enforcement efforts, and coordinate the transportation of samples.
- c. Provide supplemental enforcement services at the access and TCPs with available resources.
- d. Assist WSDA and Health representatives at Food Control Points (FCPs).
- e. Coordinate the provision of additional state law enforcement resources to local law enforcement agencies, when requested. This includes the coordination of law enforcement resources with affected counties and the state of Oregon.

5. Washington State Department of Transportation

- a. Responsible for the coordination of transportation missions, when tasked, as prescribed by the *Washington State Comprehensive Emergency Management Plan (CEMP)*. *Washington State Department of Transportation Emergency Operating Procedures* are designed to carry out this function
- b. Coordinate with WSP for traffic control resources and provide other transportation resources, as necessary. The barricades, road signs, and highway rerouting information necessary to redirect traffic from the FCAs will be provided by WSDOT, provided resources are available. The need for long-term rerouting of interstate or intrastate traffic to avoid travel in or near specific areas will be addressed by WSDOT in consultation with WSP.

6. Adams, Benton, Franklin, Kitsap, Grant, Snohomish, Walla Walla, Yakima Counties

- a. Consult with the state regarding the development and implementation of PADs.
- b. Consult with the county extension agent to identify and locate milk producers, vegetable growers, fruit growers, and home gardeners not licensed by the state to carry out protective actions for this sector of the agricultural community. The county extension agent will assist the state in determining the impact on the food chain as well as implement the PADs for the state.
- c. Develop and submit recommendations to the state on the FCA boundaries and the locations for FCPs and TCPs.
- d. Identify and commit local law enforcement resources for FCPs. Request supplemental law enforcement support, when necessary.
- e. Coordinate the application of the PADs, requesting additional resources from the state, as needed.
- f. Implement ingestion PADs. PADs are the primary responsibility of the affected county(ies). State resources may be made available to support such application, if requested. If state resources are fully committed, the state will request federal resources.

- g. Provide information on the disposition of specific commodities is disseminated to the licensed agricultural community on a case-by-case basis by the WSDA in conjunction with the county extension agent(s).

7. Adjacent States/Provinces

Washington State's emergency response to facility incidents includes coordinating PADs with the states and provinces adjacent to Washington State. Central to these relationships is the coordination between Washington and Oregon. Representatives from neighboring states may be present in the adjacent state's EOC to assist in the coordination of the decision-making process and the application of protective measures. Public information will be closely coordinated with Oregon State or other affected jurisdictions to ensure consistent messages are being given to the public.

VII. REFERENCES

See the Basic Plan, Section II. A., Authorities, of the Integrated Fixed Facility Radiological and Chemical Protection Plan.

ANNEX C, APPENDIX 1 GOVERNOR'S ORDER

Having been advised by competent authority of the deposition of radiological and/or chemical contaminants in portions of the area described by emergency proclamation _____, to wit: the release of contaminants as a result of the accident at **(facility name)** has created conditions which threaten the health and safety of people in **(list county (ies))** and pursuant to the authority vested in me by Section 43.06.220, Revised Code of Washington, I hereby order the establishment of food control areas as described below to help preserve and maintain life, health, property, and the public peace. Law enforcement agencies are directed to stop all vehicles attempting to depart from the food control areas. Commercial food transporters will be directed to return any food produced or grown within the food control areas to its point of origin. Individuals transporting small amounts of food for personal consumption will be asked to return the food to its point of origin or to present it for collection at designated food access control points. Food grown, produced, or processed within the food control areas must be inspected and released for transport by the Washington State Departments of Agriculture or Health.

The boundaries of the food control areas are:

The Washington State Recovery and Restoration Task Force will reduce the boundaries of the food control area as the contamination profile allows.

Governor

Date

THIS IS AN EXAMPLE

**ANNEX C, APPENDIX 2
FOOD SURRENDER STATEMENT**

AGRICULTURE EMBARGO AND HOLD ORDER

DEPARTMENT OF AGRICULTURE
MAILSTOP 42560
OLYMPIA, WASHINGTON 98504 - 2560
(360) 902-1800

DEPARTMENT OF HEALTH
Post Box 47800
OLYMPIA, WASHINGTON 98504 - 7800
(360) 586-5864

Date: _____

Due to suspected adulteration by a radioactive or a chemical substance caused by an accidental release radioactivity or a toxic chemical, the following food items:

shall not be sold, released, otherwise disposed of, or transported from the Food Control Area described below without written permission from the Departments of Agriculture/Health, or by written court order:

Food Control Area Description: _____

The above-described food shall be stored as follows: _____

It shall be unlawful to remove, alter, or destroy this Order or to remove the above described agriculture food product from the Food Control Area without written permission from the Departments of Agriculture/Health, or by written court order.

Agriculture Authority: _____ Phone: _____

Health Authority: _____ Phone: _____

By order of RCW 43.70.180 and RCW 69.04.110-120

Acknowledged by (driver, owner, operator): _____

THIS IS AN EXAMPLE